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Water Resources Program
Department of Ecology

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Larry Blanchard
Public Works Director
400 West Gowe
Kent, WA 98032
Fax: 253-856-6500

PHONE: 253-856-5500

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Mr. Tom Loranger
WA Dept. of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Mr. Chris Anderson
WA Dept. of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Comments on the Report of Examination for the Lake Tapps Reservoir Water Supply Project Application (S2-29934)

Dear Mr. Loranger and Mr. Anderson,

Thank you for the opportunity to comment on the Draft Report of Examination (ROE) for the Lake Tapps Reservoir Water Supply Project Application (S2-29934). The City of Kent has some concerns regarding the Lake Tapps water supply and potential impacts to the City of Kent. In addition, the City has some comments on specific references to City facilities in the Draft Report of Examination. Comments are listed below:

- 1) The City of Kent has concerns about the potential of any water from Lake Tapps being moved through the City water facilities due to the presence of contaminants such as pharmaceuticals and endocrine disruptors from a sewer treatment plant and other contaminant sources upstream of Lake Tapps. The City of Kent is concerned about potential impacts of contaminants such as pharmaceuticals and endocrine disruptors on water quality and the potential health impacts to Kent's customers.
- 2) Section 3.2.3 State Environmental Policy Act (SEPA) states that a draft environmental checklist was submitted on October 10, 2003, and with the draft being finalized on February 10, 2003, and the Mitigated Determination of Non-Significance (MDNS) being issued on February 13, 2003. These dates do not make sense, it implies the final was submitted prior to the draft. These dates should be verified and corrected.
- 3) Section 3.3.3 Source Exchange – should specifically state that the Source Exchange program is required for Cascade Water Alliance (CWA) members and voluntary for other water purveyors in the Place of Use (POU).
- 4) Line 1027 in Section 3.3.3 references section 5.3.17 for more specific details regarding the *Source Exchange Program*. Section 5.3.17 is *Measuring and Reporting Water Use*, while Section 5.3.19 describes the Source Exchange Program. The section references should be verified and corrected.
- 5) Beginning on line 2301 of the document, in Section 3.4.4.3 – Potential Effects of the Water Supply Project, there is discussion of the City of Kent's voluntary releases to Clarks Creek [Rock Creek on the Clark Springs Property] as an example of the order of

magnitude that the source exchange program could have. The City of Kent should not be listed in the ROE or the application as an example of source exchange. The City of Kent is in the process of negotiating a Habitat Conservation Plan (HCP), which includes a flow augmentation proposal of Rock Creek. This will be required in the future management of the Clark Springs facility which will be consistent with the terms and conditions of the HCP and the Implementation Agreement of the HCP. There have been no discussions with the City of Kent regarding the augmentation of Rock Creek at the Clark Springs facility and references to using the Lake Tapps water supply in supporting that augmentation program should not be included in the ROE. Specific examples, if included, should be specific to CWA members only. Any reference, implied or otherwise, to the City of Kent participating in the Lake Tapps Source Exchange program should be removed.

- 6) Section 5.3.19a Priority Surface Waters states that DOE will conduct a study for the purpose of identifying and ranking Priority Surface Waters in the POU. These waters should be limited to those affected by the CWA water utilities or utilities who express written interest in purchasing water from the project. The study should include formalized input and discussion with all agencies and utilities whose operations may be affected by the proposed source exchange program.
- 7) Section 5.3.19a(1) on page 93, lines 3317 and 3318 make reference to Section 5.3.18b and Section 5.3.18c. This is likely meant to be Sections 5.3.19b and 5.3.19c, the section references should be verified and corrected.
- 8) Section 5.3.19a(3) on line 3338 requires the Source Exchange Program to "include identification of utilities that are expected to receive water under the permit that withdraw water from an aquifer that is under significant hydraulic continuity with a Priority Surface Water or diverts from a surface water that influences flow in a Priority Surface Water." This list should be specific to utilities that are interested or may be interested in purchasing water from the Lake Tapps source and not based on speculation that a utility may purchase water in the future. To be included on the list, a utility should be a member of CWA or provide a letter of interest to CWA specifically stating they are interested in obtaining municipal water from the project.

Thank you again for the opportunity to comment on the Draft Report of Examination for the Lake Tapps Reservoir Water Supply Project Application (S2-29934). Please feel free to contact me at (253) 856-5500 if there is any additional information I might be able provide.

Sincerely,



Larry Blanchard
Public Works Director

c: Mr. Gary Gill, P.E., City Engineer
Mr. Mike Mactutis, P.E., Environmental Engineer
Mr. Brad Lake, Water Superintendent
Mr. Dave Brock, P.E., Utility Engineer
Mr. Kelly Peterson, Wellhead Protection Engineer
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